1 2 3 4 5 6 7 8 UNITED STATES DISTRICT COURT 9 NORTHERN DISTRICT OF CALIFORNIA 10 SAN JOSE DIVISION Cung Le, Nathan Quarry, Jon Fitch, on behalf of 11 Case No. 5:14-cv-05484-EJD themselves and all others similarly situated, 5:14-cv-05591- EJD 12 5:14-cv-05621- EJD Plaintiffs, 13 DECLARATION OF JOSEPH R. SAVERI IN SUPPORT OF MOTION TO APPOINT v. 14 INTERIM CO-LEAD CLASS COUNSEL Zuffa, LLC, d/b/a Ultimate Fighting 15 Championship and UFC, 16 Defendant. 17 Luis Javier Vazquez and Dennis Lloyd Hallman, on behalf of themselves and all others similarly 18 situated, 19 Plaintiffs, 20 \mathbf{v} . 21 Zuffa, LLC, d/b/a Ultimate Fighting Championship and UFC, 22 Defendant. 23 Brandon Vera and Pablo Garza, on behalf of 24 themselves and all others similarly situated, 25 Plaintiffs, 26 v. 27 Zuffa, LLC, d/b/a Ultimate Fighting Championship and UFC, 28 Defendant. 5:14-cv-05484-EJD

DECLARATION OF JOSEPH R. SAVERI

5:14-cv-05591-EJD 5:14-cv-05621-EJD

I, Joseph R. Saveri, declare:

- 1. I respectfully submit this declaration in support of Plaintiffs' Administrative Motion to Appoint Interim Co-Lead Counsel pursuant to Local Rule 7-11. I am the founding partner of the Joseph Saveri Law Firm, Inc. ("JSLF"). I am a member of the California Bar in good standing and am admitted to practice before this Court.
- 2. Pursuant to Fed. R. Civ. P. 23(g), Plaintiffs seek approval of a class leadership that includes appointment of JSLF, Cohen Milstein Sellers & Toll PLLC ("Cohen Milstein"), and Berger & Montague, P.C., as Interim Co-Lead Counsel. JSLF, Cohen Milstein, and Berger & Montague are qualified to prosecute Plaintiffs' antitrust claims, and their request is supported by all Plaintiffs and their counsel.
- 3. Attached at **Exhibit A** is a true and correct copy of a firm profile maintained by Berger & Montague, P.C.
- 4. Attached at Exhibit B is a true and correct copy of a firm profile maintained by Cohen Milstein Sellers & Toll PLLC describing the firm's activities, areas of expertise and accolades.
- 5. Attached at <u>Exhibit C</u> is a true and correct copy of a firm resume maintained by JSLF describing the firm's experience and expertise.
- 6. On January 23, 2015, I sent a copy of a proposed Stipulation and Order to John Cove, counsel for Defendant Zuffa, LLC d/b/a Ultimate Fighting Championship and UFC. Among other things, the proposed Stipulation and Order, if entered by the Court, would appoint Berger & Montague, Cohen Milstein, and JSLF as interim Co-Lead Counsel. On January 26, 2015, Counsel advised me that Defendant would not agree and would take no position on the issue of structure or leadership of plaintiffs' counsel. I advised Counsel that Plaintiffs would move the Court for such an order.

I declare under penalty of perjury under the laws of the United States and the State of California that the foregoing is true and correct to the best of my knowledge and that this declaration was executed in San Francisco, California on February 3, 2015.

/s/ Joseph R. Saveri
Toseph R. Saveri